

United States District Court

District of Massachusetts

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2004 SEP 24 P 4:08

U.S. DISTRICT COURT
DISTRICT OF MASS

Georgia McEaddy

v

Civil Action no _____

Commonwealth of Massachusetts
Suffolk County Probate and Family Court
Suffolk County Appeals Court
and the
Boston Adoption Bureau

Complaint

Parties

The plaintiff resides in Roslindale in the Suffolk County of Massachusetts and a citizen of the United States

The defendants are the Probate and Family Court and the Appeals Court both in the Suffolk County, Massachusetts. The defendant, the Boston Adoption Bureau, located at 14 Beacon Street, Boston 02108, in the Suffolk County Massachusetts

Jurisdiction

This court has jurisdiction over this matter pursuant to

Facts

1. On June 23, 2000, Lionel Williams (father), and Mary Lemoine, mother had child, Lionel 1.
2. Mrs. Lemoine surrendered Lionel to the Boston Adoption Bureau September 12, 2000 to be adopted without the ^{biological} father.
3. The Boston Adoption Bureau did not notify the father either by mail or publication of their intent to have Lionel adopted.
4. The Suffolk County Probate and Family Court failed to affirm notification to the biological father of an adoption.
5. On September 24, 2000, the adoptive parents removed the child outside the state of Massachusetts.
6. Georgia McElabbey filed for guardianship and was denied by Judge John Smoot.
Lionel Williams filed for custody and was denied by Judge John Smoot on the same day.
7. Judge Smoot was ^{prejudice} biased in his findings toward Georgia McElabbey in the following manner:

Facts of Georgia McEaddy Page 2.

Race, Socioeconomic status,

8. I would like my grandson returned to Massachusetts to me.

9. Wherefore, the Plaintiff demands judgement against the defendants for damages and such other reliefs as this Court deems ~~fit~~ just.

Respectfully submitted,

Georgia McEaddy, prose
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Roslindale, MA 02131
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